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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Rusty Haynes,  
Debtor.

Chapter 7

Case No. 11-23212 (RDD)

Rusty Haynes, Individually and On Behalf  
Of All Others Similarly Situated,

Adv. Pro. No. 13-08370 (RDD)

Plaintiffs,  
v.

Chase Bank USA, N.A.,  
Defendant.

**CHASE BANK USA, N.A.'s MOTION TO WITHDRAW THE REFERENCE**

TO THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK:

Chase Bank USA, N.A., the defendant in the captioned adversary proceeding respectfully moves the United States District Court for the Southern District of New York for an order, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules of the Bankruptcy Court, withdrawing the reference of the captioned adversary proceeding to the Bankruptcy Court for the reasons set forth in the accompanying memorandum of law with supporting declaration, which is incorporated herein by reference.

Chase has made no prior request to this Court or to any other court for the relief requested by this Motion. Chase submits this Motion without prejudice to, and without waiver of, any rights, arguments or defenses that Chase might have at law or in equity, including defenses based on lack of subject matter or personal jurisdiction.

WHEREFORE, Chase respectfully requests that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: New York, New York  
February 28, 2014

Respectfully submitted,

TROUTMAN SANDERS LLP

By: /s/Deborah A. Reperowitz

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